

NOTICE OF AMENDMENT

Certified Mail - Return Receipt Requested

August 25, 1999

Mr. Lewis Jester
President & Ceo
Plantation Pipe Line Company
945 E. Paces Ferry Road. N.E
Atlanta, Georgia 30326

CPF No. 27503-M

Dear Mr. Jester :

On March 25-27, 1997, Office of Pipeline Safety (OPS) representatives Mr. Rod Seeley and Mr. Mohammed Shoaib (Southern Region) along with Mr. Byron Coy (Eastern Region) pursuant to chapter 601 of 49 United States Code, conducted a joint inspection of the written procedures for conducting operations and maintenance activities and handling abnormal operations and emergencies at the Plantation Pipe Line Company (PPL) office in Atlanta, Georgia. These procedures are required for each pipeline operator by Title 49, Code of Federal Regulation, Part 195, Section 195.402 (a).

As a result of this inspection, it appears that PPL has committed probable violations of the HLPSA regulations, 49 CFR Part 195. The items inspected and the probable violations are :

1. **195.402 (a) Procedural manual for operations, maintenance and emergencies**

Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective.

The PPL's procedural and dispatching/operation manuals were last revised in March, 97 but the changes made, if any, do not make the manual effective. The joint OPS comprehensive review of the manuals disclosed deficiencies, as noted in items (a) through (e) which could make the manuals ineffective.

- a. The internal corrosion control procedures on pages 8-9 of technical standard E-4, does not show the current inhibitor in use and also listed JP-4 which is no longer a product of transportation and should be changed to JP-8.
- b. The maximum interval in rectifier inspection is given 2 1/2 months on page 11 of technical standard E-4 and two months in appendix A, page 55 of procedural manual, thus giving two different time frames of the same type of inspection.
- c. Reverse current switches, diodes and interference bonds are termed as critical bonds on page 13 of technical standard E-4 and does not meet the acceptable industry criteria of critical bonds.
- d. The criteria for cathodic protection as listed on page 10 of technical standard E-4 refers to NACE international standard RPO169-92, Section 6. This particular NACE standard outlines different cathodic protection criteria, applied under different conditions. For effectiveness and proper application, the manual should indicate which criteria is being in use, and applied.
- e. The section # 2.3.2.1 in procedural manual indicates that only some of the scraper trap doors are equipped with a fail-safe plug, and does not alert personnel to use pressure indicators or other techniques to assure that pressure has been removed from scraper traps before opening. The line scrapers as discussed in operator's dispatching/operations manual, reiterates the statement above, adding that extreme caution must be used when opening the closure door, but also does alert personnel to use pressure indicators or other techniques to assure that pressure has been removed from scraper traps before opening. These two conflicting statements do not make the manuals effective, and may confuse operating personnel. (Ref: 195.426)

2. 195.402 (d), Abnormal operation.

The manual required by paragraph (a) of this section must include procedures for items 1 (i-v), 2,3,4,5 under this subsection to provide safety when operating design limits have been exceeded.

The PPL interpretation inappropriately describes exceeding design limits as when there is an "escape of product from the pipeline system," and section 3.2.2 of PPL's procedural manual incorrectly indicates that only abnormal operations that result in pressures exceeding MOP requires a review and written report which is in conflict with 195.402 (d) and operator's remarks on page 45.

3. **195.402 (e) Emergencies.**

The regulation requires the emergency procedures to be reviewed at intervals not exceeding 15 months, but at least once each calendar year to insure appropriate changes as mandated by 195.402 (a).

- a. PPL did not revise or make appropriate changes in the following section of Oil Spill Recovery Contingency Plan.
 - (1) Appendix A-1 wrongly indicates the address of J.L.Comeaux as Resurgens Plaza rather than the Alpharetta location.
 - (2) Appendix B, railroad contacts were last updated on 11/1/95 and may have changed since that time.
 - (3) Appendix B-4, law enforcement agency contacts were last updated on 1/1/95 and 11/1/93.
- b. The PPL's procedural manual, section # 4.5.1 indicates that a written post-accident report is only necessary if the Region Manager, the Regulatory Affairs Manager or the Operations Control Manager deems a report necessary, when all accidents require a report.

4. **195.402 (c) Maintenance & normal operations**

The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

- (a) The tank operation procedure in the dispatching/operations manual does not address the disposition of water drawn from tank bottoms. The procedure was last revised on 4/16/1984.
- (b) The product specification control procedure in the dispatching/operations manual does not address PPL's handling of RVP gasoline & JP-8 products.
- (c) The product measurement manual has conflicting nomenclature with the procedural manual facility diagrams: Hartwell terminal, HT or HR.
- (d) The procedural manual flow diagram # 2.2.7; Collins Hub diagram does not include the Kola station.
- (e) The procedural manual is incomplete in that it does not include entire listing of MOP's which PPL operates under.

- (f) Section # 2.3.1.4 of procedural manual under safety-related conditions procedure does not address that the report shall be filed within five working days of determination and within ten working days of discovery.

There are no procedures in the PPL manuals for a number of normal operating and maintenance activities, performed by Plantation personnel:

5. **195.408 Communications**

Each operator must have a communication system to provide for the transmission of information needed for the safe operation of its pipeline system.

The PPL's SCADA operations manual, revised on January 10, 1995, does not provide written procedures for general guidance in handling system alarms in the SCADA system and for the over-short process performed by the controllers and their supervisors.

6. **195.420, Valve maintenance.**

- (a) *Each operator shall maintain each valve that is necessary for the safe operation of its pipeline systems in good working order at all times.*

There are no procedures specifying the maintenance items on each valve to be inspected nor making reference to the valve manufacturer's data sheet. PPL does not maintain a listing of mainline block valves, nor do they include a definition of the valves to be included as part of their semi-annual inspection.

7. **195.428, Overpressure safety devices.**

Requires each operator to inspect and test each pressure limiting device, relief valve, pressure regulator, or other items of pressure control equipment to determine that it is functioning properly, is in good mechanical condition and is adequate from the standpoint of capacity and reliability of operation for the service in which it is used.

There are no procedures specifying capacity, calculation, verification, and maintenance for equipment to assure their intended operation and outlining the details of inspection.

8. **195.434, Signs.**

Each operator shall maintain signs visible to the public around each pumping station and breakout tank area.

PPL's procedure does not specify maintenance of signs around each pump station and breakout tank area.

9. **195.226, Welding: Arc Burns (c)**

A ground may not be welded to the pipe or fitting that is being welded.

PPL's welding manual (Technical standard, 0-18) must include a procedure for attachment of the welding lead ground, by method other than by welding to pipe or fitting.

10. **195.266, Construction records**

A complete record that shows the following must be maintained by the operator involved for the life of each pipeline facility:

(a) The total number of girth welds and the number nondestructively tested, including the number rejected and the disposition of each rejected weld.

PPL's welding manual (Tech. standard 0-18), part 111, nondestructive testing of welds, does not address the subsection (a) of this regulation.

11. **195.402 (c) (4) Maintenance and normal operations.**

Requires the operating and maintenance manual to contain procedures for determining which pipeline facilities are located in areas that would require an immediate response by the operator to prevent hazards to the public if the facilities failed or malfunctioned.

There are no procedures for determining such facilities in PPL's procedural manual.

12. **195.442 (a) Damage prevention program**

Requires each operator to carry out a written program to prevent damage to the pipeline by excavation activities.

The PPL's damage prevention plan does not include: the identity on a current basis of persons who normally engage in excavation activities in the area in which the pipeline is located, no details of providing a means of receiving and recording notification of planned excavation activities, no details if the operator has buried pipelines in the area of excavation activity and how actual notification of persons handled who give notice of their intent to excavate of the type of temporary marking to be provided and how to identify the marking.

13. **195.403 Training**

- (a) *Each operator to establish and conduct a continuing training program to instruct operating and maintenance personnel.*

PPL do not have a written continuing training program as a part of its procedural manual, addressing all aspects of training in details, personnel training requirements in terms of checklist, contents and the subject matter covered.

As provided in 49 C.F.R. 190.237, this notice serves as your notification that this office considers your procedures/plans inadequate. Under 49 C.F. R. 190.237, you have a right to submit written comments or request an informal hearing. You must submit written comments or a request for a hearing within 30 days after receipt of this notice. After reviewing the record, the Associate Administrator for Pipeline Safety will determine whether your plans or procedures are adequate. The criteria used in making this determination are outlined in 49 C.F.R. 190.237. If you do not wish to contest this notice, please provide your revised procedures within 30 days of receipt of this notice.

Please refer to CPF No.27503-M in any correspondence and/or communication on this matter.

Sincerely,

Frederick A. Joyner
Regional Director
Office of Pipeline Safety

cc: Compliance Registry
Headquarters, OPS

Mohammed/sd/DPS-25/5/19/97
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